

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TODD WOLF,

Plaintiff,

Case No. 23-cv-149

v.

CITY OF SHEBOYGAN, et. al.,

Defendants.

**DEFENDANTS' CITY OF SHEBOYGAN, MAYOR RYAN SORENSON, CITY
ATTORNEY CHARLES ADAMS, ALDERPERSONS BETTY ACKLEY, DEAN
DEKKER, BARBARA FELDE, ROBERTA FILICKY-PENESKI, GRAZIA
PERRELLA, ANGELA RAMEY, ZACHARY RUST, AMANDA SALAZAR, MARY
LYNNE DONOHUE AND JILL PEDIGO HALL'S
EXPEDITED NON-DISPOSITIVE RULE 7(h) MOTION TO STAY PROCEEDINGS
PENDING RULING ON MOTION TO ENFORCE SETTLEMENT**

NOW COME Defendants, City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Alderpersons Betty Ackley, Dean Dekker, Barbara Felde, Roberta Filicky-Peneski, Grazia Perrella, Angela Ramey, Zachary Rust, Amanda Salazar, Mary Lynne Donohue and Jill Pedigo Hall ("Defendants") and pursuant to Local Rule 7(h) hereby move for entry of an Order that all case deadlines that have not expired will be stayed pending resolution of Defendants' Motion to Enforce Settlement and in support thereof state as follows:

1. The parties participated in two Court sponsored mediation sessions. (Murphy Decl. ¶¶ 7-8)
2. On May 14, 2024, the parties reached an oral settlement agreement. (Murphy Decl. ¶ 12)

3. At the conclusion of the mediation, Magistrate Dries brought the parties back together and recorded the terms of the oral settlement agreement. (Murphy Decl. ¶ 13)

4. Magistrate Dries minute entry at 11:53 a.m. on May 14, 2024 reflects that the mediation resulted in settlement and following approval of the settlement by the Common Council, the parties were directed to file dismissal documents. (Murphy Decl. ¶ 16)

5. Defendants will be filing a Motion to Enforce Settlement.

6. While there is a text order advising that the matter has been settled, out of an abundance of caution, Defendants seek a formal Order staying all pending case deadlines that have not already expired pending resolution of Defendants' Motion to Enforce Settlement.

7. No party would be prejudiced by such an Order. In fact, Defendants would be prejudiced if such an Order is not entered because they would be required to expend additional money and resources litigating a matter that has already been settled.

8. Defendants counsel contacted Plaintiff's counsel to inquire regarding whether Plaintiff resisted this Motion but have not received a response as of the filing of the Motion.

WHEREFORE, Defendants respectfully request that this Court enter an Order staying all pending case deadlines that have not expired pending resolution of Defendants' Motion to Enforce Settlement.

Dated this 28th day of May, 2024.

MWH LAW GROUP LLP

Attorneys for Defendants City of Sheboygan, Mayor
Ryan Sorenson, City Attorney Charles Adams,
Alderspersons Betty Ackley, Dean Dekker, Barbara
Felde, Roberta Filicky-Peneski, Grazia Perrella,
Angela Ramey, Zachary Rust, Amanda Salazar, and
Sheboygan Area School District Board Member
Mary Lynne Donohue

By: /s/ Electronically signed by Kerrie M. Murphy

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